

**United States Bankruptcy Court
Northern District of
Texas**

In Re:
Blanca Rivera Craft, xxx-xx-4808
9140 Timber Oaks Dr.
Fort Worth, TX 76179

Case No.: 18-44288
Chapter: 13
Judge: Edward L. Morris

**Statement in Response to Notice of Amount Deemed Necessary to Cure Mortgage Arrears
(per Local Bankruptcy rule 3002-2 regarding Trustee's Mid Case Audit of Plan and Mortgage)**

Part 1: Pre-Petition Arrears

Creditor **agrees** that the debtor(s) has paid in full the amount required to cure the pre-petition default to be paid through the Chapter 13 Plan.

If creditor disagrees:

Amount due to cure pre-petition arrears: \$ N/A

Attach an itemized account of any required pre-petition amounts that the secured creditor contends remain unpaid as of the date of the *Notice of Amount Deemed Necessary to Cure Mortgage Arrears (per Local Bankruptcy rule 3002-2 regarding Trustee's Mid Case Audit of Plan and Mortgage)*.

Part 2: Post-petition Arrears

Outside the plan: Creditor **does not agree** that the debtor(s) has paid all post-petition amounts due to be paid outside the Chapter 13 Plan directly to the secured creditor.

If the creditor disagrees:

Amount due to cure post-petition arrears due outside the plan: \$950.00 per PPFN filed 12/14/2018.

Attach an itemized account of any required post-petition amounts that the secured creditor contends remain unpaid as of the date of the *Notice of Amount Deemed Necessary to Cure Mortgage Arrears (per Local Bankruptcy rule 3002-2 regarding Trustee's Mid Case Audit of Plan and Mortgage)*.

Inside the plan: Creditor Agrees that the debtor(s) have paid \$55,662.29 towards the total Allowed Claim amount of \$77,950.53, which consists of payments towards Principal and Interest only, and that the remaining amount to be paid through the Chapter 13 Plan is \$22,288.24 as of the date of the Trustee's Notice.

If the creditor disagrees:

Attach an itemized account of any required post-petition amounts that the secured creditor contends remain unpaid as of the date of the *Notice of Final Cure Payment*, citing court orders or *Notices of Fees, Expenses and Charges* issued during the case.

Part 3: Sign Here

The person completing this Statement must sign it. Print your name and other identifying information.

Check the appropriate box.

I am the creditor.

☒ I am the creditor's authorized agent.

(Attach a copy of power of attorney, if any.)

I certify under penalty of perjury that the foregoing is true

and correct. /s/ Chase Berger

Signature

Date: 6/3/2022

Print: Chase Berger

BANKRUPTCY ATTORNEY

Name

Title

Ghidotti Berger

Company

9720 Coit Road, Suite 220-228

Address

Plano, TX 75025

(949) 427-2010

bknotifications@ghidottiberger.com

Phone

Email

Part 4: Service

Notice Mailed to:

Debtor(s) (address):1

Debtor(s)' Counsel:

☒ Via CM/ECF

“ Via email (email address):

“ Via US Mail (address):

Trustee:

☒ Via CM/ECF

Fill in this information to identify the case:

Debtor 1 Blanca Rivera Craft
aka Blanca Pachares

Debtor 2
 (Spouse, if filing) _____

United States Bankruptcy Court for the: Northern District of Texas
 (State)

Case number 18-44288-ELM13

Official Form 410S2**Notice of Postpetition Mortgage Fees, Expenses, and Charges**

12/16

If the debtor's plan provides for payment of postpetition contractual installments on your claim secured by a security interest in the debtor's principal residence, you must use this form to give notice of any fees, expenses, and charges incurred after the bankruptcy filing that you assert are recoverable against the debtor or against the debtor's principal residence.

File this form as a supplement to your proof of claim. See Bankruptcy Rule 3002.1.

Name of creditor: Specialized Loan Servicing LLC Court claim no. (if known): 8-1

Last four digits of any number you use to identify the debtor's account: 4142

Does this notice supplement a prior notice of postpetition fees, expenses, and charges?

- ☒ No
☐ Yes. Date of the last notice: _____.

Part 1: Itemize Postpetition Fees, Expenses, and Charges

Itemize the fees, expenses, and charges incurred on the debtor's mortgage account after the petition was filed. Do not include any escrow account disbursements or any amounts previously itemized in a notice filed in this case. If the court has previously approved an amount, indicate that approval in parentheses after the date the amount was incurred.

Description	Dates incurred	Amount
1. Late charges	_____	(1) _____
2. Non-sufficient funds (NSF) fees)	_____	(2) _____
3. Attorney fees	_____	(3) _____
4. Filing fees and court costs	_____	(4) _____
5. Bankruptcy/Proof of claim fees	Proof of Claim	11/27/2018 (5) \$350.00
	Proof of Claim Loan Payment History	11/27/2018 (5) \$300.00
	Plan Review Fee	11/06/2018 (5) \$300.00
6. Appraisal/Broker's price opinion fees	_____	(6) _____
7. Property inspection fees	_____	(7) _____
8. Tax advances (non-escrow)	_____	(8) _____
9. Insurance advances (non-escrow)	_____	(9) _____
10. Property preservation. Specify:	_____	(10) _____
11. Other. Specify:	_____	(11) _____
12. Other. Specify:	_____	(12) _____
13. Other. Specify:	_____	(13) _____
14. Other. Specify:	_____	(14) _____
15. Total post-petition fees, expenses, and charges. Add all of the amounts listed above.		(15) \$950.00

The debtor or trustee may challenge whether the fees, expenses, and charges you listed are required to be paid. See 11 U.S.C. §1322(b)(5) and Bankruptcy Rule 3002.1.

Debtor 1

Blanca Rivera Craft
 First Name Middle Name Last Name

Case Number (if known) 18-44288-ELM13

Part 2: Sign Here

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.

/s/ **Mukta Suri**

Signature

Date **12/24/2018**

Print

Mukta Suri

First Name Middle Name Last Name

Title

Authorized Agent for Specialized Loan
Servicing, LLC

Company

Bonial & Associates, P.C.

Address

14841 Dallas Parkway, Suite 425
Number Street

Dallas, Texas 75254

City State ZIP Code

Contact phone

(972) 643-6600

Email

POCInquiries@BonialPC.com

CERTIFICATE OF SERVICE OF NOTICE OF POST PETITION MORTGAGE, FEES, EXPENSES AND CHARGES

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in interest on or before December 24, 2018 via electronic notice unless otherwise stated:

Debtor *Via U.S. Mail*

Blanca Rivera Craft
9140 Timber Oaks Dr
Fort Worth, TX 76179

Debtors' Attorney

Christopher Marvin Lee
Lee Law Firm, PLLC
8701 Bedford Euless Road
Suite 510
Hurst, TX 76053

Chapter 13 Trustee

Tim Truman
6851 N.E. Loop 820, Suite 300
N. Richland Hills, TX 76180

Respectfully Submitted,

/s/ **Mukta Suri**

total debt	TPA
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Date	Amount Recvd	PRE/POST/APO	Post Petition Due Date	Contractual Due Date	Amount Due	Over/Shortage	Suspense Credit	Suspense Debit	Total PTD	POC Arrears Credit	POC Debit	POC Suspense Balance	POC Paid to Date	Fee/Escrow Deposit	Comment
Beginning Suspense Balance							\$0.00		\$0.00			\$0.00		\$0.00	
11/5/2018		Pre					\$0.00		\$0.00			\$2,215.01		\$0.00	
4/3/2019	\$3,100.29	Post					\$3,100.29	\$3,100.29	\$3,100.29			\$2,215.01		\$0.00	
							\$0.00		\$3,100.29			\$2,215.01		\$0.00	
5/6/2019	\$751.28	Post					\$751.28	\$751.28	\$3,851.57			\$2,215.01		\$0.00	
6/7/2019	\$1,627.76	Post					\$1,627.76	\$1,627.76	\$5,479.33			\$2,215.01		\$0.00	
7/9/2019	\$1,697.33	Post					\$1,697.33	\$1,697.33	\$7,176.66			\$2,215.01		\$0.00	
8/6/2019	\$2,396.59	Post					\$2,396.59	\$2,396.59	\$9,573.25			\$2,215.01		\$0.00	
							\$0.00		\$9,573.25			\$2,215.01		\$0.00	
9/9/2019	\$759.38	Post					\$759.38	\$759.38	\$10,332.63			\$2,215.01		\$0.00	
10/2/2019	\$1,771.88	Post					\$1,771.88	\$1,771.88	\$12,104.51			\$2,215.01		\$0.00	
11/18/2019	\$1,645.32	Post					\$1,645.32	\$1,645.32	\$13,749.83			\$2,215.01		\$0.00	
12/6/2019	\$1,645.32	Post					\$1,645.32	\$1,645.32	\$15,395.15			\$2,215.01		\$0.00	
1/6/2020	\$1,687.50	Post					\$1,687.50	\$1,687.50	\$17,082.65			\$2,215.01		\$0.00	
2/7/2020	\$1,687.50	Post					\$1,687.50	\$1,687.50	\$18,770.15			\$2,215.01		\$0.00	
3/19/2020	\$1,687.50	Post					\$1,687.50	\$1,687.50	\$20,457.65			\$2,215.01		\$0.00	
5/7/2020	\$1,687.50	post					\$1,687.50	\$1,687.50	\$22,145.15			\$2,215.01		\$0.00	
							\$0.00		\$22,145.15			\$2,215.01		\$0.00	
5/8/2020	\$1,687.49	post					\$1,687.49	\$1,687.49	\$23,832.64			\$2,215.01		\$0.00	
6/12/2020	\$1,653.75	post					\$1,653.75	\$1,653.75	\$25,486.39			\$2,215.01		\$0.00	
							\$0.00		\$25,486.39			\$2,215.01		\$0.00	
7/9/2020	\$1,620.00	post					\$1,620.00	\$1,620.00	\$27,106.39			\$2,215.01		\$0.00	
8/5/2020	\$810.00	post					\$810.00	\$810.00	\$27,916.39			\$2,215.01		\$0.00	
9/2/2020	\$1,557.69	post					\$1,557.69	\$1,557.69	\$29,474.08			\$2,215.01		\$0.00	
10/6/2020	\$1,495.38	post					\$1,495.38	\$1,495.38	\$30,969.46			\$2,215.01		\$0.00	
11/3/2020	\$2,145.80	post					\$2,145.80	\$2,145.80	\$33,115.26			\$2,215.01		\$0.00	
11/30/2020	\$810.00	post					\$810.00	\$810.00	\$33,925.26			\$2,215.01		\$0.00	
1/5/2021	\$2,367.69	post					\$2,367.69	\$2,367.69	\$36,292.95			\$2,215.01		\$0.00	
		post					\$0.00		\$36,292.95			\$2,215.01		\$0.00	
2/2/2021	\$1,495.38	post					\$1,495.38	\$1,495.38	\$37,788.33			\$2,215.01		\$0.00	
3/2/2021	\$1,744.61	post					\$1,744.61	\$1,744.61	\$39,532.94			\$2,215.01		\$0.00	
		post					\$0.00		\$39,532.94			\$2,215.01		\$0.00	
4/7/2021	\$1,245.81						\$1,245.81	\$1,245.81	\$40,778.75			\$2,215.01		\$0.00	
5/5/2021	\$1,001.70	post					\$1,001.70	\$1,001.70	\$41,780.45			\$2,215.01		\$0.00	
6/2/2021	\$1,046.22	post					\$1,046.22	\$1,046.22	\$42,826.67			\$2,215.01		\$0.00	
							\$0.00		\$42,826.67			\$2,215.01		\$0.00	
7/8/2021	\$1,636.11	post					\$1,636.11	\$1,636.11	\$44,462.78			\$2,215.01		\$0.00	
8/9/2021	\$1,090.74	Post					\$1,090.74	\$1,090.74	\$45,553.52			\$2,215.01		\$0.00	
9/8/2021	\$1,090.74	post					\$1,090.74	\$1,090.74	\$46,644.26			\$2,215.01		\$0.00	
10/6/2021	\$1,090.74	post					\$1,090.74	\$1,090.74	\$47,735.00			\$2,215.01		\$0.00	
11/2/2021	\$1,072.65	post					\$1,072.65	\$1,072.65	\$48,807.65			\$2,215.01		\$0.00	
12/6/2021	\$1,581.84	post					\$1,581.84	\$1,581.84	\$50,389.49			\$2,215.01		\$0.00	
1/7/2022	\$1,054.56	post					\$1,054.56	\$1,054.56	\$51,444.05			\$2,215.01		\$0.00	
1/31/2022	\$1,054.56	post					\$1,054.56	\$1,054.56	\$52,498.61			\$2,215.01		\$0.00	
3/2/2022	\$1,054.56	post					\$1,054.56	\$1,054.56	\$53,553.17			\$2,215.01		\$0.00	
4/7/2022	\$1,054.56	post					\$1,054.56	\$1,054.56	\$54,607.73			\$2,215.01		\$0.00	
5/3/2022	\$1,054.56	post					\$1,054.56	\$1,054.56	\$55,662.29			\$2,215.01		\$0.00	
							\$0.00		\$55,662.29			\$2,215.01		\$0.00	
							\$0.00		\$55,662.29			\$2,215.01		\$0.00	
TOTAL PTD:							\$0.00		\$55,662.29			\$2,215.01		\$0.00	
\$55,662.29							\$0.00		\$55,662.29			\$2,215.01		\$0.00	
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							\$0.00		\$55,662.29			\$2,215.01		\$0.00	
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

**In Re:
Blanca Rivera Craft**

Debtors.

Case No.: 18-44288-elm13

Chapter (13)

Judge Edward L. Morris

CERTIFICATE OF SERVICE

On June 03, 2022, I served the foregoing Statement in Response to Notice of Amount Deemed Necessary to Cure on the following individuals by electronic means through the Court's ECF Program.

COUNSEL FOR DEBTOR:

Eric Allen Maskell ecf@leebankruptcy.com

TRUSTEE

Tim Truman ftworthchapter13trustee-ecf@ch13ftw.com

COUNSEL FOR TRUSTEE:

Angela D. Allen angelaa@ch13ftw.com

U.S. TRUSTEE: ustpregion06.da.ecf@usdoj.gov

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 03, 2022

/s/ Ana Palacios
Ana Palacios

On June 03, 2022, I served the foregoing Statement in Response to Notice of Amount Deemed Necessary to Cure on the following individuals by depositing true copies thereof in the United States mail at Santa Ana, California, enclosed in a sealed envelope, with postage paid, addressed as follows:

DEBTOR:

Blanca R. Craft, 9140 Timber Oaks, Fort Worth, TX 76179

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 03, 2022

/s/ Ana Palacios
Ana Palacios